

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHARU DESAI,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 4:19-cv-10520-TSH
	)	
UNIVERSITY OF MASSACHUSETTS,	)	
MEMORIAL MEDICAL CENTER, INC.	)	
UNIVERSITY OF MASSACHUSETTS	)	
MEMORIAL MEDICAL GROUP,	)	
UNIVERSITY OF MASSACHUSETTS	)	
MEDICAL SCHOOL, UMASS	)	
MEMORIAL HOSPITAL, MAX ROSEN,	)	
M.D., DARREN BRENNAN, M.D.,	)	
STEPHEN TOSI, M.D., KARIN DILL,	)	
M.D.,	)	
Defendants.	)	
	)	

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFF

The law firm Freiburger & Washienko LLC (the “Firm”) respectfully moves this Court, pursuant to Local Rule 83.5.2, to allow it and its attorneys, Patricia A. Washienko and Marc D. Freiburger (the “Attorneys”) to withdraw as counsel for Plaintiff Charu Desai, M.D. As grounds, the Attorneys state as follows:

1. Since filing Plaintiff’s Oppositions to Defendants’ Motions for Summary Judgment, there has been an irretrievable breakdown in the attorney-client relationship. Undersigned counsel can provide more information to the Court *in camera* if requested.

2. On March 3, 2022, Plaintiff instructed undersigned counsel to stop working on her case as she had retained alternate / successor counsel to represent her in this matter moving forward, including representing her at the Hearing on Defendants’ Motions for Summary Judgment, scheduled to be held on March 28, 2022.

3. Plaintiff's successor counsel entered Notices of Appearances yesterday, March 15, 2022.

WHEREFORE, Freiburger & Washienko LLC and its attorneys, Patricia Washienko and Marc Freiburger, respectfully move this Court to allow the Firm and the Attorneys to withdraw as counsel for Plaintiff in this matter.

Respectfully submitted,

**CHARU DESAI, M.D.,**  
By her attorneys,

/s/ Patricia A. Washienko  
Patricia A. Washienko, BBO# 641615  
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Dated: March 16, 2022

CERTIFICATE OF SERVICE

I, Patricia A. Washienko, hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this day.

/s/Patricia A. Washienko  
Patricia Washienko

Dated: March 16, 2022